### IN THE CIRCUIT COURT OF ST. LOUIS COUNTY STATE OF MISSOURI

STATE OF MISSOURI ex rel., Attorney	)
General Chris Koster and the Missouri	)
Department of Natural Resources,	)
Plaintiff,	) Case No. 13SL-CC01088
v.	)
REPUBLIC SERVICES, INC.,	)
ALLIED SERVICES, LLC, and	)
BRIDGETON LANDFILL, LLC, Defendants.	) ) )
	,

## STATUS REPORT

Comes now Bridgeton Landfill, LLC ("Bridgeton Landfill") by and through counsel, and states as follows:

- 1. On May 13, 2013, an Agreed Order was entered requiring a status report to be submitted on or before June 3, 2013 and the first business day of each month thereafter.
- 2. The status update must discuss, at a minimum, work on site, compliance with the Agreed Order, and planned activities for the next 30 days.
  - 3. This serves as a status report as required under the Agreed Order.

#### REPORT OF WORK ON SITE

During June 2014, Bridgeton Landfill conducted the following Work on the Site:

- 4. Routine erosion control and maintenance and ongoing monitoring consistent with facility operations and agreed process;
  - 5. Continuation of operation and maintenance of gas collection and control system;

- 6. Continuation of upgrades to gas collection and control system as needed;
- 7. Continuation of operation of Thermal Oxidizer air treatment unit on 316k gallon leachate treatment tank;
- 8. Continuation of operation of 5,000 SCFM Regenerative Thermal Oxidizer for odor control for Tanks 1 and 2 of one-million gallon leachate treatment tanks;
- 9. Completion of electrical work for leachate tank farm and pre-treatment power house;
  - 10. Completion of tank piping and equipment at tank farm;
  - 11. Preparation of pre-treatment plant for trial start-up operation;
- 12. Continue to build biomass operations in Tank 3 of one-million gallon leachate treatment tanks;
  - 13. Continuation of planning for construction of leachate force main; and
- 14. Continuation of routine operation and maintenance of gas interceptor wells and temperature monitoring probes.

## REPORT OF COMPLIANCE WITH AGREED ORDER

In addition to the work on Site, as outlined above, Bridgeton Landfill conducted the following activities in compliance with the direction of the Agreed Order:

- 15. The weekly reports required under Section 52.F were submitted on June 3, 2014; June 10, 2014; June 17, 2014; and June 24, 2014;
  - 16. The monthly report required under Section 52.E was submitted on June 13, 2014;
- 17. A revised Volume 1 of the Operations, Maintenance and Management Plan was submitted on June 20, 2014 responding to comments received from MDNR on June 2, 2014; and

18. The Second Amendment to the First Agreed Order of Preliminary Injunction was entered on June 20, 2014.

# REPORT OF PLANNED ACTIVITIES FOR NEXT 30 DAYS

During the next thirty (30) days, Bridgeton Landfill plans to conduct the following activities at the Site:

- 19. Continue ditching and drainage work and routine sediment and erosion control;
- 20. Continue construction, planning and start-up operations of the on-site leachate pre-treatment plant, and tank farm;
  - 21. Initiate implementation of the Odor Management Plan;
- 22. Prepare for the first of three comprehensive air sampling events to be conducted under the Second Amendment to the First Agreed Order;
- 23. Prepare and submit work plans to further the Odor Investigation required by the Second Amendment to the First Agreed Order;
- 24. Continue coordination with the utility company of final connection of the natural gas line to the flare compound;
  - 25. Initiate work to lower gas extraction wells;
  - 26. Initiate construction on phase one of leachate force main construction;
  - 27. Install three additional TMP's by July 13, 2014; and
- 28. If required, continuation of work under approved North Quarry GCCS Expansion and EVOH Capping System plan.

Dated: July 1, 2014

LATHROP & GAGE LLP

By:

Matthew A. Jacober (Mo #51585) mjacober@lathropgage.com

Pierre Laclede Building

7701 Forsyth Blvd. St. Douis, MO 63105

Phone: (314) 613-2800

Fax: (314) 613-2801

And

William G. Beck (Mo. #26849)

wbeck@lathropgage.com

Allyson E. Cunningham (Mo. #64802)

acunningham@lathropgage.com

2345 Grand Blvd., Suite 2200

Kansas City, MO 64108 Phone: (816) 292-2000

Fax: (816) 292-2001

ATTORNEYS FOR DEFENDANT

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above pleading was served via first class United States mail, postage prepaid, on this 1<sup>st</sup> day of July, 2014, upon the following counsel of record:

Attorney for Defendant

Chris Koster Attorney General, State of Missouri Joe Bindbeutel Daren Eppley P.O. Box 899 Jefferson City, Missouri 65102

Phone: 573.751.3640 Fax: 573.751.8796 Joe.bindbeutel@ago.gov

ATTORNEYS FOR PLAINTIFF

5